

(Translation)

## **Anti-Fraud and Corruption Policy**

### **Nirvana Development Public Company Limited**

Nirvana Development Public Company Limited Anti-Fraud and Corruption Practices Singha Estate Public Company Limited is committed to conducting its business with integrity and transparency and in accordance with the law for all business activities of the Company in every country and every relating organization. For this purpose, the Company encourages and stimulates all directors, executives, and employees of all levels to accord importance to and be conscious of anti-fraud and corruption practices. Moreover, internal control system has been implemented to prevent of corruptions or briberies with the following practices:

- Do not engage in all forms of briberies, directly or indirectly.
- Do not neglect or ignore when facing with any act deemed fraud or corruption-related to the Company. It is a duty to report such wrongdoings to the supervisor or officer in charge and to cooperate in case investigations. The Company shall establish fairness and protect any person refusing to engage in a fraud or corruption or report a fraud or corruption to the Company in accordance with the Company's Whistleblowing Policy and Procedure and Whistleblower Protection Policy.
- Implement regularly a bribery or corruption risk assessment and an appropriate risk management system and report the assessment result to the Company's Board.
- Implement an internal control system covering finance, accounting, data recording, purchasing, personnel employment, and other processes concerning fraud or corruption.
- Declare the intent to not accept bribery for the benefits of the Company's business partners by explicitly stating it in the purchasing or employment documents.
- Implement an internal inspection to ensure the effectiveness of the internal control system and risk assessment and compliance of every working unit with the Company's provisions and regulations. Identify mistakes and weak points and provide advice for development of (Translation) operation system effectiveness and performance in accordance with the Company's Corporate Governance Framework and Code of Ethics.
- Communicate and familiarize the Company's employees and other business parties and stakeholders with these Practices.

Approved by the Board of Directors Meeting

No. 1/2020 held on 20 February 2020